

REMARKS

Claims 1-98 are pending in the application.

The Applicant respectfully requests that the Examiner reconsider earlier rejections in light of the following remarks. No new issues are raised nor is further search required as a result of the changes made herein. Entry of the Response is respectfully requested.

Claims 7-23, 30-43, 47-53, 60-75 and 82-98 over Li

In the Office Action, claims 7-23, 30-43, 47-53, 60-75 and 82-98 were rejected under 35 U.S.C. §103(a) as allegedly being obvious over U.S. Patent No. 6,799,299 to Li et al. ("Li"). The Applicant respectfully traverses the rejection.

Claims 7-23, 30-43, 47-53, 60-75 and 82-98 respectively recite determining an address for uniquely locating an item of content to be extracted and a site mining address for locating an item of content in a source page.

The Examiner acknowledged that Li "does not specifically disclose the above expressions as an address (see Office Action, page 3). However, the Examiner alleges that use of addresses for uniquely locating an item of content to be extracted from Li disclosure in Fig. 4A and col. 8, lines 55-58 that discloses HREF HTML link addresses within code (see Office Action, page 3).

Li in Fig. 4A and its accompanying text discloses:

Turning now to FIGS. 14A-14D, an illustration of HTML code is depicted in accordance with a preferred embodiment of the present invention. HTML file 1400 includes the setting of the background color and two line feeds in section 1402 in FIG. 14A. Six HTML links named Home, Products, Documentations, Records, Support, and Contact are centered in section 1404. A stylistic line stored as a graphics interface format (GIF) image is drawn next by the code in section 1406. A title "Employer Records" is added to the document in section 1408. All of these items are features that were not part of the table structure as displayed in FIG. 13.

Thus, Fig. 14 A simply discloses HTML code that includes items that were added to the table structure shown in Fig. 13. NOTHING within Fig. 4A or its accompanying text discloses or suggest anything related to using an address for any reason, much less an address for uniquely locating an item of

content to be extracted, as recited by claims 7-23, 30-43, 47-53, 60-75 and 82-98.

The Examiner alleged that it would have been obvious to one skilled in the art to “use external HREF link addresses for uniquely locating content, and as part of transformation information, providing the benefit of increasing locations of possible extraction.” (see Office Action, page 3). However, using an address targets content that would **NOT increase** the locations of possible extraction but **decrease** the extraction to only those items that are at a particular address. Thus, the Examiner’s motivation to modify Li is flawed.

Moreover, the Examiner has failed to show how modifying Li’s invention to use an address for extraction would increase locations of possible extraction. Li’s invention uses pattern matching (see Li, col. 5, lines 62-66). Pattern matching potentially can return a large number of items that match the specified pattern. Thus, Li’s invention **already has the benefit** of potentially having a large number of locations of possible extraction that would **NOT** benefit from use of an address.

Moreover, as discussed above, an address allows targeting of content at a particular address. Li’s invention is directed toward finding any content that matches a specified pattern, i.e., teaching use of an **open search** for content that matches a specified pattern. A prior art reference must be considered in its entirety, i.e., as a whole, including portions that would **lead away** from the claimed invention. MPEP §2141.02, page 2100-127 (Rev. 2, May 2004) (citing W.L. Gore & Assoc. v. Garlock, Inc., 220 USPQ 303 (Fed. Cir. 1983), cert. denied, 469 U.S. 851 (1984)). Li teaches **AWAY** from using a targeted search for content that results from using an address.

Thus, Li relies on pattern matching to determine on which elements an action is to performed. In contrast, Applicant’s claimed features rely on an **address**. Pattern matching fails to disclose or suggest use of an **address**, much less determining an **address** for uniquely locating an item of content to be

extracted and a site mining address for locating an item of content in a source page, as recited by claims 7-23, 30-43, 47-53, 60-75 and 82-98.

A benefit of determining an address for uniquely locating an item of content to be extracted and a site mining address for locating an item of content in a source page is, e.g., reduced computation to locate an item of content. Pattern matching by a computer is a relatively processor intensive operation that requires time to complete, the amount of time dependent on the type of processor used to perform the operation. In contrast, use of an address requires little to no processing by a processor an address directs a processor to an item of content. Thus, use of an address to locate an item of content requires fair less computational power from a processor to locate and speeds finding the item of content. The cited prior art fails to disclose or suggest the claimed features having such benefits.

Accordingly, for at least all the above reasons, claims 7-23, 30-43, 47-53, 60-75 and 82-98 are patentable over the prior art of record. It is therefore respectfully requested that the rejection be withdrawn.

Claims 1-6, 24-29, 44-46, 54-59 and 76-81 over Li in view of Bickmore

In the Office Action, claims 1-6, 24-29, 44-46, 54-59 and 76-81 were rejected under 35 U.S.C. §103(a) as allegedly being obvious Li in view of U.S. Patent No. 6,857,102 to Bickmore et al. ("Bickmore"). The Applicant respectfully traverses the rejection.

Claims 1-6, 24-29, 44-46, 54-59 and 76-81 recite a system and method generating a site template to format a layout of a stylesheet based on capabilities of a mobile device.

The Examiner acknowledged that Li fails to disclose content selection and style manipulation are expressly performed based on the capabilities of a mobile device client (see Office Action, page 7). However, claims 1-6, 24-29, 44-46, 54-59 and 76-81 recite generating a site template to format a layout of a stylesheet based on capabilities of a mobile device. Thus, the deficiency in Li is that Li fails to disclose generating a site template to format

a layout of a **stylesheet** based on capabilities of a mobile device, as recited by claims 1-6, 24-29, 44-46, 54-59 and 76-81. The Examiner continued to apparently ignore the claimed features.

As discussed above, the Examiner acknowledges that Li fails to disclose content selection and style manipulation are expressly performed based on the capabilities of a mobile device client (see Office Action, page 7). The Examiner relies on Brickmore to allegedly make up for the deficiencies in Li to arrive at the claimed features.

The Examiner alleges that Brickmore discloses generating a site template based on capabilities of a mobile device and generating content and style transformation information based on capabilities of a mobile device in Figs. 1, 2, 11 and 16; and col. 3, line 55-col. 5, line 16.

Brickmore appears to disclose an automatic re-authoring system and method to re-author a document originally designed for display on a desktop computer screen for display on a smaller display screen, such as a PDA or a cellular telephone (Abstract). A document is defined as any set of information retrieved as a single entity from a distributed network, such as the Internet (See Brickmore, col. 6, lines 17-29).

Thus, Brickmore disclose automatic re-authoring of a document from the Internet. However, contrary to the Examiner allegation, Brickmore fails to even mention use of a site template and a stylesheet, much less a site template to format a layout of a stylesheet, much less a system and method generating a **site template** to format a layout of a **stylesheet** based on capabilities of a mobile device, as recited by claims 1-6, 24-29, 44-46, 54-59 and 76-81.

The Examiner argued in the Response to Arguments section of the Office Action that Brickmore discloses a site template based on capabilities of a mobile device (see Office Action, page 8). However, Applicant's claimed site template is used to format a layout of a stylesheet. Thus, even if Brickmore discloses a site template based on capabilities of a mobile device, although the Applicant could not find mention of use of any type of template, Brickmore's

acknowledged site template that is based on capabilities of a mobile device is **NOT** a **site template** to format a layout of a **stylesheet** based on capabilities of a mobile device, as recited by claims 1-6, 24-29, 44-46, 54-59 and 76-81.

Thus, Li modified by Brickmore would STILL fail to disclose or suggest a site template to format a layout of a stylesheet, much less a system and method generating a **site template** to format a layout of a **stylesheet** based on capabilities of a mobile device, as recited by claims 1-6, 24-29, 44-46, 54-59 and 76-81.

Moreover, even if Brickmore disclosed use of a site template and a stylesheet, which as discussed above Brickmore fails to even mention, there is no suggestion within the prior art to modify Li with the disclosure of Brickmore. "Teachings of references can be combined only if there is some suggestion or incentive to do so." In re Fine, 5 USPQ2d 1596,1600 (Fed. Cir. 1988) (quoting ACS Hosp. Sys. v. Montefiore Hosp., 221 USPQ 929, 933 (Fed. Cir. 1984)) (emphasis in original). The Examiner alleges that Li discloses transformation for various devices, such as a notebook, handheld or PDA (See Office Action, page 7). Thus, although Li recognized various devices having various capabilities, Li fails to even mention performing different types of transformations for different types of devices. Li fails to disclose or suggest any NEED to be modified to perform any function based on capabilities of a mobile device, with any such modification of Li based on improper hindsight. The Examiner has failed to refute that Li lacks any type of NEED to be modified to perform any function based on capabilities of a mobile device, with any such modification of Li based on improper hindsight, with any such modification being based on improper hindsight.

The Examiner alleged that it would have been obvious to perform the content selection and style transformation of Li according to the capabilities of a mobile device client as taught by Brickmore as that the appropriate amount of style of content would have been displayed on a mobile device having a limited display as taught by Brickmore in col. 3, lines 55-63. The Applicants respectfully disagree.

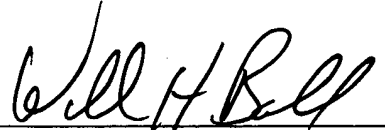
Brickmore at col. 3, lines 55-63 appears to disclose "automatic re-authoring ... to provide broad access to web documents or other web content from a wide range of devices". However, Brickmore is able to perform such automatic re-authoring to provide broad access to web documents or other web content from a wide range of devices WITHOUT generating a site template to format a layout of a stylesheet based on capabilities of a mobile device. Modifying Li with Brickmore's disclosed method to perform such automatic re-authoring to provide broad access to web documents or other web content from a wide range of devices would result in the benefit that the Examiner relies on WITHOUT generating a site template to format a layout of a stylesheet based on capabilities of a mobile device. The Examiner has STILL failed to provide reason why one skilled in the art would modifying Li with anything other than Brickmore's disclosure to arrive at the relied on benefit.

Accordingly, for at least all the above reasons, claims 1-6, 24-29, 44-46, 54-59 and 76-81 are patentable over the prior art of record. It is therefore respectfully requested that the rejection be withdrawn.

Conclusion

All objections and rejections having been addressed, it is respectfully submitted that the subject application is in condition for allowance and a Notice to that effect is earnestly solicited.

Respectfully submitted,
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A handwritten signature in black ink, appearing to read "William H. Bollman", written over a horizontal line.

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